

Frank Reed

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April 20, 2016

Judge Martin Glenn
US Bankruptcy Court
1 Bowling Green
New York, NY 1004

RE: Reed v Rescap Borrower's Claims Trust
Case No. 12-12020

Dear Judge Glenn:

The Borrower's Claims Trust has sent a document production request that is currently returnable to them this Friday, April 22, 2016. I informed the Trust's counsel who propounded the discovery request, Barbara Hager at the firm of Reed Smith, that I needed more time to collect what she has requested to the best of my ability. TO this end I asked fro an additional 1 week to do this, setting a new return date of next Friday, April 29, 2016.

I am attempting to get relevant documents from parties who are outside the jurisdiction of this Court and therefore are not subject to a subpoena. As such, I rely only on their good graces to accomplish the task at hand.

Additionally, as you know, I am doing these things on my own and frankly, with 6 kids and my physical ability to accomplish things greatly reduced compared to many, all of my work takes much longer than my adversaries.

Those things being said, the Trusts Counsel is not currently even in their offices as they are away on personal matters, so I am inferring that there should be no prejudice to them regarding time. If so , I will gladly agree to any time they need additional to digest and review what I produce.

Therefore, pursuant to the scheduling order, I respectfully request that this Court intervene and grant an order extending the return date of the Trust's document discover by one week.

Sincerely,

Frank Reed

Frank Reed
Creditor, Pro Se